

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10288-RWZ

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UNITED STATES

v.

JOSEPH ALLEN

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**DEFENDANT'S MOTION TO READ AND PROVIDE COPY OF  
INDICTMENT TO JURY**

Joseph Allen, defendant in the above-captioned criminal case, hereby moves this Court, pursuant to the Fifth and Sixth Amendments to the United States Constitution, to read the relevant portions of the indictment to the jury at the outset of trial and to provide a copy of the relevant portions of the indictment to the jury during its deliberations. As grounds therefore, defendant avers that he is charged with conspiring with twelve named individuals, and it is important for the jury to know who those individuals are in order to determine whether the defendant is guilty of the conspiracy charged in the indictment.

Respectfully submitted,

**JOSEPH ALLEN**

By his attorneys,

/s/ James L. Sultan  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 4, 2006.

/s/ James L. Sultan  
James L. Sultan